

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



May 23, 2016

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Agency Counsel for Ethics

SUBJECT: Determination Regarding Attendance by NASA employees at the Secure World Foundation Lunch on May 31, 2016

On May 31, 2016, the Secure World Foundation, a nonprofit organization under 501(c)(3) of the Internal Revenue Code, will host a lunch at the Carnegie Endowment for International Peace located at 1779 Massachusetts Avenue, NW in Washington, D.C., from 12:00 p.m. through 2:00 p.m. The event is to discuss the 2011 National Security Space Strategy and also discuss the challenges of current and future trends in space.

Approximately 1,400 people have been invited to attend, including members of Congress and their staff, representatives from industry, Federal agencies, media, academia, members of the general public and embassy personnel. The estimated cost of the event, including all food and beverages, is approximately \$15 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2). I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to exchange information regarding various NASA programs.

NASA employees – including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490 – whose duties do not substantially affect the Secure World Foundation or a majority of its members, may accept an invitation for free attendance to the lunch for themselves and a guest.

However, NASA employees whose duties may substantially affect the Secure World Foundation, or a majority of its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone